

**Public Hearing of the Michigan Department of Community Health/Michigan
Certificate of Need Commission**

**Regarding CON Review Standards for
Psychiatric Beds/Services
January 31, 2006**

My name is Phyllis Adams and I am a health care attorney with Dykema Gossett PLLC. I am here today representing Forest View Hospital and to provide comments at this public hearing on the CON Review Standards for Psychiatric Beds/Services. Forest View Hospital is located in Grand Rapids, Michigan and brings over 30 years of experience to the evaluation, diagnosis and treatment of a wide range of behavioral health problems. Forest View Hospital's services include an acute inpatient psychiatric programs for adults and children and adolescents. The Hospital also offers a partial hospital program and various other outpatient psychiatric services. It also operates one of the few, if not the only, unique inpatient programs for adolescent eating disorders in the entire State. Other programs offered by Forest View include DBT (dialectical behavior therapy) and programs designed to treat co-occurring disorders. Not surprisingly, Forest View Hospital experiences consistently high occupancy of its inpatient psychiatric beds.

Under the current systems that govern placement of inpatient psychiatric patients, Forest View receives patients from many communities outside of Grand Rapids, Kent County, or the immediately adjacent counties. In fact, patients are placed at Forest View from areas north of Grand Rapids such as Traverse City and into the Upper Peninsula; areas south of Grand Rapids, including Indiana; areas west of Grand Rapids all along the lakeshore (Holland/Muskegon); and areas east of Grand Rapids as far away as Detroit. Additionally, patients are placed at the Forest View Hospital trauma program from all over the Midwest.

Forest View Hospital urges the CON Commission to add the CON Review Standards for Psychiatric Beds and Services to its current work plan. These Standards have been in place since 1995 with only minor revisions. However, the mental health care delivery system has changed significantly during the past 10 years and the existing Standards are outdated in many respects. We believe the Standards could, and should, be updated to better reflect the goals of the CON

program including cost, quality and access. Specifically, we would suggest that a Standard Advisory Committee review whether it may be appropriate to address the uneven distribution of psychiatric patients in Michigan by a review of the current bed need methodology, a review of current planning areas, or the addition of a high occupancy exception to permit a hospital to add more psychiatric beds if certain occupancy targets are attained. We understand that the CON Review Standards for Hospital Beds includes a high occupancy exception and a similar exception may be appropriate for the Psychiatric Standards. We also suggest that the Standard Advisory Committee review the current replacement zone for psychiatric hospital beds. It is possible that the replacement zone should be adjusted to reflect the more regional provision of these services.

We appreciate this opportunity to offer comments on these Standards and again, urge the Commission to add these Standards to its work plan for the earliest consideration possible.

Phyllis Adams
Dykema Gossett PLLC
2723 S. State Street, Suite 400
Ann Arbor, Michigan 48104
(734) 214-7664
pdadams@dykema.com

On behalf of:
Forest View Hospital
1055 Medical Park Drive SE
Grand Rapids, Michigan 49546
Attn: Wayne Miller
(616) 942-9610
Wayne.miller@uhsinc.com

AA01\165707.1
ID\PGD